

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with)	
Enhanced 911 Emergency Calling Systems)	
)	

**Cellular XL Associates, L.P.'s Report on
Implementation of Wireless E911 Phase II
Automatic Location Identification**

Cellular XL Associates, L.P. ("Cellular XL") hereby submits its report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI"), pursuant to the Commission's Fourth Memorandum Opinion and Order in the above-captioned proceeding.

I. Background/Contact Information

A. Carrier Identifying Information

Name: Cellular XL Associates, L.P.
TRS Number: 812377

B. Contact Information

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II. E911 Phase II Location Technology Information

A. Type of Technology

Cellular XL has contacted its switch manufacturer as well as three handset manufacturers to explore both network-based and handset-based solutions for Phase II E911 compliance. To date, Cellular XL has been advised by one of the

manufacturers contacted that it is not taking steps to develop an E911 Phase II solution. The three remaining vendors have not yet provided Cellular XL with information pertaining to their proposed solutions. Consequently, Cellular XL has thus far been unable to adequately compare the various Phase II solutions in order to determine which solution would best enable it to comply with the FCC's E911 requirements, and has not yet selected a solution for its Phase II ALI technology. Cellular XL intends to continue its dialogue with its vendors to obtain sufficient information regarding the available technologies for network-based and handset-based solutions to enable it to make an informed decision. Whichever technology Cellular XL ultimately selects, it intends to deploy it consistent with the Commission's rules.

B. Testing and Verification

Cellular XL has not yet selected a testing methodology to determine the accuracy of its ALI solution since it is still in the process of examining available products. However, Cellular XL intends to comply with OET Bulletin No. 71 with respect to testing and verification methods used to gauge the accuracy of the technology it ultimately chooses.

C. Implementation Details and Schedule

Although Cellular XL is awaiting information regarding available technologies from its handset and switch manufacturers, it has developed a tentative implementation schedule to meet either the Commission's handset-based or network-based rules. Cellular XL anticipates that it will be in the position to make its ALI solution choice by the first quarter of 2001. If Cellular XL selects a handset-based solution, it will begin selling ALI-capable handsets by October 1, 2001, as required by the Commission's rules. If Cellular XL chooses a network-based solution, it intends to deploy its chosen technology after the first quarter of 2001. Cellular XL will accelerate this schedule to the extent necessary upon receipt of a PSAP request. Ultimately, however, Cellular XL's implementation schedule will be governed by the availability of network-based or handset-based solutions.

D. PSAP Interface

Cellular XL has yet to receive a PSAP request. Many of the PSAP interface details are dependent upon the technology that Cellular XL chooses to deploy and the specific requests of the PSAP.

E. Existing Handsets

If Cellular XL selects a handset-based solution, its upgrade and/or replacement strategy and schedule will depend, in part, on the cost and availability of

new ALI-capable handsets. As of this date, Cellular XL has been unable to obtain adequate information concerning such costs from its handset manufacturer.

F. Location of Non-Compatible Handsets

If Cellular XL selects a handset-based solution, it will run promotions throughout its service territory in order to locate existing customer handsets for upgrading and/or replacement, as necessary.

G. Other Information

The rural nature of Cellular XL's service territory may present additional and unforeseen difficulties in installing and testing location technology. Cellular XL would be in a better position to determine how it will ultimately implement its Phase II plan if the vendor products were available for testing. Unfortunately, Cellular XL's implementation plan is largely dependent on the schedules and plans of its vendors.